



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

ICR/AFM/KCB  
F. #2018R01047

*271 Cadman Plaza East  
Brooklyn, New York 11201*

July 31, 2020

By Email and ECF

James M. Branden  
Albert Y. Dayan  
Kenneth J. Kaplan  
Joel M. Stein  
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Todd D. Greenberg  
John S. Wallenstein  
Richard D. Willstatter

Re: United States v. Jack Cabasso, et al.  
Criminal Docket No. 19-CR-582 (DRH)

Dear Counsel:

The government has made available a further production of discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure. As with the government's prior productions, this material can be obtained by contacting John Palermo at DupeCoop at 973-895-1359. In addition, because of the relatively limited size of this production, the government is able to share it with counsel using USAfx, the Department of Justice's secure online file sharing program. Counsel who wish to access the discovery via USAfx may contact the undersigned to obtain user credentials.

This production supplements the disclosures of Rule 16 discovery produced to individual defendants on January 14, 2020, and to all defendants on June 24, 2020, July 2, 2020 and July 10, 2020. The government renews its request for reciprocal discovery from the defendants.

Specifically, enclosed please find the following materials, which are subject to the protective order entered in this case on May 29, 2020:

Records	Bates Number
Email data from Microsoft Corporation and Google LLC, obtained pursuant to the judicially-authorized search warrants produced to you at AVENTURA_0000080255 to AVENTURA_0000080270	AVTESI_0000939875-AVTESI_0000981117
Email data from the United States General Services Administration	AVTESI_0000981118-AVTESI_0000986475

The email data consists of load files containing native, text and TIFF files. The government is currently processing this data into Ipro Eclipse format, and expects to make that alternate dataset available to you when processing is complete.

If you have any questions or requests regarding further discovery or a disposition of this matter, please do not hesitate to contact us.

Very truly yours,

RICHARD P. DONOGHUE  
United States Attorney

By:                     /s/                      
Ian C. Richardson  
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Enclosures

cc: Clerk of the Court (DRH) (by ECF) (without enclosures)